

December 5, 2005

TO: Mr. Kevin Hancock  
FROM: Nora Mena  
SUBJECT: CAFO General Permit Comments

Thank you for the opportunity to comment on the revised draft permit. We will be happy to discuss any of these or other comments or proposed language changes with you. Our comments are as follows:

Permit

Definitions:

- 1.) Add a definition for Certification (or drop the reference to certification later in the permit)
- 2.) Definition for Veal (what would be the size or pound)
- 3.) Definition of Discharge

Page 11, S3.A.3.c.

Add after 'five years for phosphorus content' and annually or no less than once in three years for Nitrogen depending on location and the nutrient practice standard (590).

In addition, you may want to reconsider testing for Phosphorus to look at increasing frequency of testing should levels be higher or to look at requiring testing for phosphorus at both one and two foot depths.

Page 12, S3, C

Certification is not defined in the permit and it is unclear what the intention is in referencing this. Under the Dairy Nutrient Management Act, any CAFO Dairy will still get their plan approved and certified by the Conservation District. If the facility is to notify the agency when their plan is fully implemented (S3, B.2), then an inspector can plan to inspect the facility for full compliance.

Page 13, S4, A.1.b.(i)

Consider adding after 'discharge' within 24 hours after the discharge (See S4B.1.); The responsibility to report within 24 hours is more clearly explained in Section S4.B.1., however including the reference here may help prevent confusion in the future.

Page 14, S.4.B Reporting

WSDA currently does not have a 24 hr. number to report to should the facility try to notify the agency after regular hours. Should a second number be included for 24 hour coverage?

Page 15, S4, C.2.b

Change first sentence to read; Large CAFOs must collect soil samples from land application areas as prescribed in their Nutrient Management Plan. The best timing for taking samples varies and is determined in the NMP.

Page 17, S7, B

Add (iv) There are no outstanding fees or penalties. This seems appropriate for any size facility.

### Fact Sheet

#16 What biosecurity measures do WSDA inspectors use?

The following two items are incorrect:

1. Vehicles are parked on paved or concrete .....
2. Vehicle traffic passing on other than paved.....will be thoroughly cleaned....

Suggest changing language in #2 to “Vehicle traffic passing on other than paved or concrete areas will be confined to area that are considered common area, i.e. driveway used by milk truck for collection of milk. When this is not possible the vehicles should be thoroughly cleaned to be...”

Most facilities do not have concrete areas to park on, or such an area adjacent to the road. Most have gravel or dirt roads and parking. The focus is to avoid driving in the facility, to park as far from the production activity traffic as possible and to avoid any areas of manure, leachate, or other waste material.

Vehicles are not generally cleaned between sites. However, care is taken not to visit more than one poultry operation in a single day to minimize potential contamination. Should a site be visited that did raise concerns for contamination, then the inspector would consider getting the vehicle cleaned immediately.

Consider adding: Inspectors will use clean, disinfected boots for each site visit. Inspectors carry disinfectant with them and clean their boots on site prior to getting in their vehicle and treat them with the disinfectant when placed in the vehicle.

This is one of the most important day to day bio-security measures for inspectors.